

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re Alexander E. Jones Debtor,	Bankruptcy Case No. 22-33553 (CML) Chapter 11
In re Free Speech Systems LLC Debtor,	Bankruptcy Case No. 22-60043 (CML) Chapter 11

**JOINT NOTICE REGARDING AGREED ORDER ON
DEBTORS' MOTION FOR APPROVAL OF COMPROMISE AND
SETTLEMENT UNDER FEDERAL RULE OF BANKRUPTCY PROCEDURE 9019**

PLEASE TAKE NOTICE that Alexander E. Jones ("Jones"), Free Speech Systems, LLC ("FSS," and together with Jones, the "Debtors"), and the Texas Plaintiffs¹ (collectively, the "Parties") have reached a consensual agreement to extend the deadline to lift the automatic stay set forth in the *Agreed Order on Debtors' Motion for Approval of Compromise and Settlement Under Federal Rule of Bankruptcy Procedure 9019* (the "Agreed Order") [Dkt. Nos. 374 and 673]. The Parties have agreed that the deadline set for December 5, 2023 at 12:01 a.m. (CST) in the Agreed Order will be moved to May 1, 2024 at 12:01 a.m. (CST) at which time the automatic stay shall lift, unless otherwise extended pursuant to the terms of the Agreed Order, solely to allow pre-trial proceedings and discovery to move forward in the Pozner/De La Rosa Action with no further action required by this Court or the Texas Plaintiffs. If no documented consensual agreement among the parties is reached by June 3, 2024 at 12:01 a.m. (CST), then the automatic stay shall be

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Agreed Order.

lifted with respect to the commencement of trial. All other deadlines established in the Agreed Order shall remain in effect unless otherwise agreed by the Parties.

Dated: December 5, 2023

/s/ Jennifer J. Hardy

WILLKIE FARR & GALLAGHER LLP

Jennifer J. Hardy (Texas Bar No. 24096068)
600 Travis Street
Houston, Texas 77002
Telephone: 713-510-1700
Facsimile: 713-510-1799
Email: jhardy2@willkie.com

AND

Rachel C. Strickland (admitted *pro hac vice*)
Stuart R. Lombardi (admitted *pro hac vice*)
Ciara A. Sisco (admitted *pro hac vice*)
787 Seventh Avenue
New York, New York 10019
Telephone: 212-728-8000
Facsimile: 212-728-8111
Email: rstrickland@willkie.com
slombardi@willkie.com
csisco@willkie.com
Bankruptcy Co-Counsel to the Texas Plaintiffs

/s/ Raymond W. Battaglia

**LAW OFFICES OF RAY BATTAGLIA,
PLLC**

Raymond W. Battaglia (TX Bar No. 01918055)
66 Granburg Circle
San Antonio, Texas 78218
Telephone: 210-601-9405
Email: rbattagliaw@outlook.com
Counsel to Free Speech Systems, LLC

MCDOWELL HETHERINGTON LLP

Avi Moshenberg (TX Bar No. 24083532)
1001 Fannin Street
Suite 2700
Houston, Texas 77002
Telephone: 713-337-5580
Facsimile: 713-337-8850
Email: avi.moshenberg@mhllp.com

AND

**CHAMBERLAIN, HRDLICKA, WHITE,
WILLIAMS & AUGHTRY, PC**

Jarrold B. Martin (TX Bar No. 24070221)
1200 Smith Street
Suite 1400
Houston, Texas 77002
Telephone: 713-356-1280
Facsimile: 713-658-2553
Email: jarrod.martin@chamberlainlaw.com
Bankruptcy Co-Counsel to the Texas Plaintiffs

/s/ Vickie L. Driver

CROWE & DUNLEVY, P.C.

Vickie L. Driver (TX Bar No. 24026886)
Christina W. Stephenson (TX Bar No. 24049535)
2525 McKinnon St., Suite 425
Dallas, Texas 75201
Telephone: 737-218-6187
Email: dallaseservice@crowedunlevy.com

AND

JORDAN & ORTIZ, P.C.

Shelby A. Jordan (TX Bar No. 11016700)
Antonio Ortiz (TX Bar No. 24074839)
500 North Shoreline Blvd., Suite 900
Corpus Christi, Texas 78401
Telephone: 361-884-5678
Facsimile: 361-888-5555
Email: sjordan@jhwclaw.com
Email: aortiz@jhwclaw.com
Counsel to Alexander E. Jones

CERTIFICATE OF SERVICE

I certify that on December 5, 2023, a true and correct copy of the foregoing was served on all parties registered to receive electronic notice of filings in this case via this Court's ECF notification system.

/s/ Jennifer J. Hardy

Jennifer J. Hardy